

To: FCC

From: Dr. Paul Vixie, Chairman and Chief Scientist, Internet Systems Consortium (ISC)

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I am writing today in support of your recently adopted principles of open measurement in broadband networks. Objectivity is vital to every scientific endeavor and I therefore wish to underscore the importance of having measurement servers not be under the control of any measured ISP nor of any joint venture controlled collectively by multiple ISPs. Transparency is equally vital which is why all data collected for the purpose of measuring broadband network performance must be made openly available. The scientific research community must be in a position to review and audit both the collected network measurement data and also the methods used to collect that data.

Please consider that the Internet which has become humanity's central nervous system and has driven out all competing approaches to communication was the product of the research and education community not the commercial sector. By developing the Internet's foundation technologies out in the open where the greatness of an idea rather than size of a prior investment steered our way forward, the Internet has opened a new chapter in human history. By developing operating systems such as BSD and Linux using the "open source" model, we have seen to it that the whole world and not just a few patent holders could create the infrastructure of not only the Internet but also the World Wide Web.

Internet Systems Consortium (ISC) is a strong supporter of M-Lab's work in this area because their goals, methods, and competencies ideally and deliberately match the need for open, transparent, and scientifically valid measurement of Internet performance "in the large".

/s/ Paul Vixie

Redwood City, California